

## REMARKS

Applicants appreciatively acknowledge the Examiner's courtesies in conducting an interview by phone with their patent counsel on November 28<sup>th</sup> and following up thereafter with indication as to allowability of claims 3, 5, 6, 8, 13, 17-21, 22-29 and 54-58 as currently amended. The substance of Applicants' presentation at the interview is set forth hereinbelow. Claim 30, and those dependent directly or indirectly therefrom, remain open to further discussion, as presented hereinbelow.

The Action of August 18, 2006, in paragraph 3, states that claims 11-12 and 45 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. By the present Response, Applicants have done so. Claim 56 is original claim 11 written in independent form. Claim 57 is original claim 12 written in independent form. Claim 58 is original claim 45 written in independent form.

The Action of August 18, 2006, in paragraph 5, states that claims 22-29 would be allowable if rewritten or amended to overcome the rejection(s) under 35 U.S.C. 112, second paragraph, set forth in the Action. By the present Response, Applicants amend claim 22 to provide the requested antecedent basis for the recitation of "the activity folders" by adding the recitation in the second paragraph of the claim "said general folder structure having one or more activity folders".

As discussed at the phone interview, Applicants amend claim 22 to remove the limitation that the subject matter of that claim be a "computer program product". As amended, the claim (and those dependent therefrom) is directed to "**a computer-readable storage medium**". Because much software is delivered nowadays by the Internet rather than on CD-ROM, and then resides on a computer-readable storage medium in the user's computer, the amended claim better reflects current reality. At the phone interview the Examiner agreed that, as amended, claim 22 is allowable, along with those claims directly or indirectly dependent therefrom.

Based on the phone interview, claim 54 adds language derived from paragraph 0088 of the specification: "**wherein the general folder structure contains all applications available to the user on the computer**". Applicants submit that this clearly distinguishes Outlook and Mellin, and the Examiner subsequently told Applicants' counsel that claim 54 would be allowable.

Claim 30 is amended to recite the following:

**30. A method for displaying and manipulating computer files within an information handling system comprising a general purpose computer having access to storage for computer files, such files comprising (a) executable application programs that generate various kinds of application type files and (b) application type files, the computer providing a computing environment via a user interface comprising an input responsive to user commands and a display capable of presenting the computer files in a general folder structure including one or more activity folders, the method comprising:**

**automatically identifying a particular communication comprising one or more files of one or more application types;  
automatically storing each of the files of the particular communication as separate files in one and the same activity folder;  
and**

**automatically generating code for associating said separate files of the particular communication with each other;**

**thereby automatically allowing the separate files of the particular communication to be manipulated by user commands as independent files from said activity folder regardless of the application type.**

Applicants respectfully submit that the recitation in claim 30 of “automatically storing each of the files of the particular communication as separate files in one and the same activity folder, [and] automatically generating code for associating said separate files of the particular communication with each other; thereby automatically allowing the separate files of the particular communication to be manipulated by user commands as independent files from said activity folder regardless of the application type” is not suggested by either or both of the references or any other prior art of record. Neither Outlook nor Mellin teaches or suggests automatically separating the parts of a communication and storing them together in one and the same activity folder.

We remind the Examiner that the applicable Mellin prior art is not the published PCT application WO 01/65336 ("Mellin PCT"), but the provisional application 60/185,719 ("Mellin Provisional"). We pointed this out with a detailed explanation in our response of June 6, 2006 (pages 14-15, 18-19). As stated in that response, it is significant because although the Mellin PCT seems to teach "code for association", the Mellin Provisional does not. On the other hand, Applicant's provisional U.S. patent application (no. 60/219,294) does teach "code for association" of the attachments and message (page 20, lines 22-26), antedating the Mellin PCT reference.

Even if one of ordinary skill in the art were to read the Mellin Provisional and Outlook references at the same time, he would not find obvious the recitation of claim 30. Both references teach that emails and their attachments, once extracted, are **separated** from each other **into separate filing systems altogether**, not stored together in a single activity folder where they may be manipulated by user input. Mellin and Outlook not only fail to offer the functionality recited in claim 30, they each are designed to prevent it—forcing the parts of the email into separate filing systems altogether, if they are ever to be manipulated independently by the user.

In contrast to the recitation in Applicants' claim 30 of "**automatically storing each of the files of the particular communication as separate files in one and the same activity folder**" the Mellin Provisional shows that the system uses a repository for attachments (Mellin Provisional, "Attachment Server/Repository" in Figure 1 and "Subsystem Responsibilities" table on page 6) that is distinct from the location of the messages of the communications.

Microsoft Outlook 98 ("Outlook") does not teach automatic extraction of the attachments at all. Applicants acknowledge that Outlook teaches that a user can **manually** extract the attachments from a message, copying them from Outlook's storage system (which does not allow manipulation of the attachments as independent files) into the computer's native file system (which does). However, for the process of extracting the message and attachments from Outlook's storage system, there is no mechanism for "**automatically storing each of the files of the particular communication as separate files in one and the same activity folder ... thereby automatically allowing the separate files of the particular communication to be manipulated by user commands as independent files from said activity folder regardless of the application type.**"

Applicants earnestly submit that the subject matter of claim 30 is not obvious from a combination of the aforesaid references because in fact it involves a paradigm shift from the prior art. Both Outlook and Mellin adhere to the same conventional assumption that once attachments have been separated/extracted from the email message, then those files should be managed in an entirely separate filing system than that of the email message. Applicants recognized the value of, and created a system and method for, ensuring that a message and its accompanying files, upon receipt, are automatically stored in the same activity folder while also allowing the files to be manipulated independently, through user commands regardless of the application type. The value of this includes the speed and convenience of manipulating the separate but related parts of a communication, both messages and attachments, in the same folder without any intermediary steps.

The system described in the Mellin Provisional presents attachments separately in a Document Manager and subsequently requires the intermediate step of downloading the attachments from a server (Mellin Provisional, page 6, lines 26-31). If the user desires to work with the files arriving in the Outlook system as email attachments, he would have to extract them manually.

Neither of the references even hints at the functionality of the method of claim 30 or its potential value to the user. For this reason, too, the combination of these two prior art references would not suggest to one of ordinary skill in the art the subject matter recited in claim 30. Accordingly, claim 30 is allowable, and so are the claims dependent thereupon, namely claims 31-35, 37-40, and 42-52.

## CONCLUSION

Entry of the claims as amended herein and prompt notice of allowance are respectfully solicited. If any questions remain, the Examiner is cordially invited to phone Applicants' counsel.

Respectfully submitted:	
/GerryJayElman/	Elman Technology Law, P.C.
	Customer No. 3775
Gerry J. Elman	Phone: 610-892-9942
Registration No. 24,404	
Scott R. Powell	
Registration No. 58,378	